



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

AUG 12 2014

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-084

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Shimone Mizrahi
Managing Partner
Rainier Commons, LLC
918 South Horton Street, Suite 1018
Seattle, Washington 98134

Re: Amendment to the Risk-Based Disposal Approval for Polychlorinated Biphenyl Bulk Product Waste at the Rainier Commons Facility, 3100 Airport Way South, Seattle, Washington 98134
EPA ID No. WAD 05123 9994

Dear Mr. Mizrahi:

The Particulate Monitoring Plan (Plan) for Phase I dated July 18, 2014, submitted by Rainier Commons on July 29, 2014 is hereby approved subject to the conditions below. This approval effectively amends the December 18, 2013 Risk Based Disposal Approval (RBDA) as Amendment 3. Amendment 2 expired July 7, 2014, therefore any approvals or conditions listed therein are no longer valid. The Plan reflects a shift from daily analytical air monitoring approved in the June 17, 2014 Phase I IPWP Approval (Amendment 1) to total particulate dust monitoring using an SKC HAZ-DUST EPAM-5000.

Conditions:

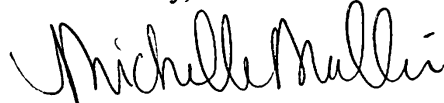
1. Rainier will continue to ensure that interior spaces with openings along the active blasting surface will be vacant during blasting hours.
2. The action level for dust inside spaces designated as "Live/Work" in the document titled "RC-Tenant Count August 2014" submitted by Vered Mizrahi on August 8, 2014 at 3:06 pm is Not To Exceed (NTE) background.
3. The action level for dust inside non-residential spaces is 0.05 mg/ m³.
4. The action level for dust monitoring outside the building is 0.05 mg/ m³.
5. Background levels for all indoor spaces affected by blasting, and outdoor spaces shall be established pursuant to the July 18, 2014 Particulate Monitoring Plan and submitted to EPA for review prior to any blasting activity occurring.
 - a. For outdoor spaces, Rainier shall set up and secure the monitoring equipment upwind of the blasting area to determine the background level. Data shall be collected for a minimum of 45 consecutive minutes, pursuant to pages 3-9 of the equipment instruction manual. This data will be recorded based on the Time Weighted Average (TWA) and used for the day's background dust level.
 - b. For indoor spaces, an 8-hour background dust level will be collected in each identified tenant space/unit, following the same steps as for outdoor sample collection.
6. If any action level in Conditions 2-4 is exceeded for any area Rainier Commons will report the exceedance to EPA as soon as practicable, but no later than 24 hours. This shall include photo documentation of any visible breach and/or repair activity.

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7. If the action level for inside spaces designated as “Live/Work” under Condition 2 is exceeded at any time:
 - a. Blasting activity will cease immediately and Rainier will mitigate the cause of the exceedance.
 - b. Rainier will report the exceedance to EPA pursuant to Condition 6.
 - c. Rainier will immediately collect an indoor air sample for metals and PCBs following the procedures and conditions in the June 17, 2014 Amendment 1.
 - d. The dust/paint/blasting material will be cleaned up according to the PCB Spill Cleanup Policy, including the collection of a wipe sample from any surface affected by a breach, or requested by EPA, pursuant to 40 CFR 761.243. Rainier will wait for EPA approval before resuming blasting activities.
8. If the action level in outdoor areas or indoor non-residential spaces under Conditions 3 and 4, respectively, is exceeded at any time, but less than 0.5 mg/m^3 :
 - a. Rainier will mitigate the cause of the exceedance.
 - b. Rainier will report the exceedance to EPA pursuant to Condition 6.
 - c. If a visible breach is noted:
 - i. Rainier will immediately collect an air sample for metals and PCBs following the procedures and conditions in the June 17, 2014 Amendment 1.
 - ii. The dust/paint/blasting material will be cleaned up according to the PCB Spill Cleanup Policy, including the collection of a wipe sample from any surface affected by a breach, or requested by EPA, pursuant to 40 CFR 761.243.
 - d. Blasting may continue unless EPA directs otherwise.
9. If at any time the dust concentration in outdoor areas or indoor non-residential spaces under Conditions 3 and 4, respectively, exceeds 0.5 mg/m^3 :
 - a. Blasting activity will cease immediately and Rainier will mitigate the cause of the exceedance.
 - b. Rainier will report the exceedance to EPA pursuant to Condition 6.
 - c. Rainier will immediately collect an air sample for metals and PCBs following the procedures and conditions in the June 17, 2014 Amendment 1.
 - d. The dust/paint/blasting material will be cleaned up according to the PCB Spill Cleanup Policy, including the collection of a wipe sample from any surface affected by a breach, or requested by EPA, pursuant to 40 CFR 761.243. Rainier will wait for EPA approval before resuming blasting activities.
 - e. If the exceedance occurred in the outdoor environment, Rainier shall sample the sediment catch basins identified as sampling locations in the December 18, 2013 RBDA following the next rain event with measurable flow.
10. If at any time a breach of the containment structure is either observed by visual identification of dust, paint or blasting material; or if a manometer sensor identifies a drop in pressure below the previously approved level of 0.02” of water, but the dust monitoring data does not identify any exceedances as defined in the Conditions above:
 - a. Rainier will mitigate the cause of the exceedance.
 - b. Rainier will report the exceedance to EPA pursuant to Condition 6.
 - c. Rainier will immediately collect an air sample for metals and PCBs following the procedures and conditions in the June 17, 2014 Amendment 1.
 - d. The dust/paint/blasting material will be cleaned up according to the PCB Spill Cleanup Policy, including the collection of a wipe sample from any surface affected by a breach, or requested by EPA, pursuant to 40 CFR 761.243.

- e. If the release occurred in the outdoor environment, Rainier shall sample the sediment catch basins identified as sampling locations in the December 17, 2013 RBDA following the next rain event with measurable flow.
11. Rainier shall submit weekly reports every Monday for the work that proceeded the week prior and any updates for the upcoming week. Reports shall include all daily background readings, daily dust monitoring readings, any tenant interactions, photographs, and a general progress report including any problems encountered and actions taken to mitigate problems.

Sincerely,



Michelle Mullin,
PCB Coordinator

cc via email: Dan Cargill
Washington State Department of Ecology

Jo M. Flannery
Ryan, Swanson, Cleveland, PLLC

Arnaud Girad
King County Industrial Wastewater Program

Vered Misrahi
Rainier Commons, LLC

Beth Schmoyer
Seattle Public Utilities

Richard Thomas
Washington State Department of Ecology

Bruce Tiffany
King County Industrial Wastewater Program